

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 06-60202

18 U.S.C. § 1349

18 U.S.C. § 1344

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 1028

18 U.S.C. § 1029

CR-COHN

MAGISTRATE JUDGE
SNOW

UNITED STATES OF AMERICA,

Plaintiff,

vs.

A.D. HAMPTON,
SHERAN LAWERANCE,
CHRISTOPHER THOMAS,
TYDELL ALLEN,
SISSY WELCH,
JENNIFER NEW,
JOHN FLORESTAL,
SINCLAIR BRIAN ELLIS,
and
TYESHA CASON,

Defendants.

FILED BY
2006 OCT 17 PM 1:27
D.C.

INDICTMENT

The Grand Jury charges that:

COUNT 1

(CONSPIRACY 18 U.S.C. §1349)

1. From in or about January 2000, and continuing thereafter until on or about the date of the return of this Indictment, in Broward, Palm Beach, and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

**A.D. HAMPTON,
SHERAN LAWERANCE,
CHRISTOPHER THOMAS,
TYDELL ALLEN,
SISSY WELCH,
JENNIFER NEW,
JOHN FLORESTAL,
SINCLAIR BRIAN ELLIS,
and
TYESHA CASON,**

did knowingly and intentionally combine, conspire, confederate and agree with each other and with persons known and unknown to the Grand Jury to commit an offense against the United States, that is, to knowingly execute and attempt to execute a scheme and artifice to defraud financial institutions, to wit: Bank of America, Wachovia Bank, Washington Mutual, Union Planters Bank, SunTrust, Interamerica Bank, Bank Atlantic, Fidelity Federal, AmTrust Bank, First Union, the deposits of which were insured by the Federal Deposit Insurance Corporation, and Broward Schools Credit Union, Tropical Federal Credit Union, and Keys Federal Credit Union, credit unions with accounts insured by the National Credit Union Share Insurance Fund, and to obtain monies, funds, credits, assets, securities, and other property owned by and under the custody and control of these financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

OBJECT OF CONSPIRACY

The object of the conspiracy was as follows:

2. The Defendants **A.D. HAMPTON, SHERAN LAWERANCE, CHRISTOPHER THOMAS, TYDELL ALLEN, SISSY WELCH, JENNIFER NEW, JOHN FLORESTAL, SINCLAIR BRIAN ELLIS, and TYESHA CASON,** and others sought to unjustly enrich

themselves and others through the uttering and cashing of stolen checks at Bank of America, Wachovia Bank, Washington Mutual, Union Planters Bank, SunTrust, Interamerica Bank, Bank Atlantic, Fidelity Federal, AmTrust Bank, First Union, Broward Schools Credit Union, Tropical Federal Credit Union, and Keys Federal Credit Union, using stolen, false, and fraudulent identification.

MANNER AND MEANS

3. Defendant **A.D. HAMPTON** recruited others to participate in bank fraud. **A.D. HAMPTON** and other co-conspirators committed thefts of identifications, checks, debit cards, and credit cards from various victims and used those stolen checks and identifications himself, or provided those stolen checks and identifications to other co-conspirators, who then traveled to the various banks and negotiated the checks. **A.D. HAMPTON** provided co-conspirators with wigs, hats, sunglasses, and other items to disguise their appearances.

4. Defendant **SHERAN DENISE LAWERANCE, a/k/a Gail Lawrance, a/k/a Gail Brutton, a/k/a Sabrina Brutton, a/k/a Sebrina Thomas, a/k/a Tammi Turner, a/k/a Gail Brown**, was **A.D. HAMPTON**'s girlfriend. She recruited other co-conspirators to participate in bank fraud. She assisted **HAMPTON** in organizing the others and obtained stolen, false and fraudulent identifications and stolen checks, provided them to others, and directed the others to negotiate the checks. **LAWERANCE** provided co-conspirators with wigs, hats, sunglasses, and other items to disguise their appearances.

5. **CHRISTOPHER THOMAS** recruited others to participate in bank fraud. He obtained stolen identifications and stolen checks and distributed them to others to negotiate the stolen checks. **THOMAS** and other co-conspirators committed thefts of identifications, checks, debit cards, and

credit cards from various victims and used those stolen checks and identifications himself, or provided those stolen checks and identifications to other co-conspirators, who then traveled to the various banks and negotiated the checks.

6. **TYDELL ALLEN** was responsible for obtaining stolen identification and checks. Through the perpetration of robberies, auto burglaries, distraction thefts, and purse snatchings, he obtained checks, credit cards, debit cards, and identification from various victims and provided them to **A.D. HAMPTON, SHERAN LAWERANCE** and **CHRISTOPHER THOMAS**.

7. **SISSY WELCH** obtained stolen identification and stolen checks from **A.D. HAMPTON, SHERAN LAWERANCE**, and **CHRISTOPHER THOMAS**. Armed with the stolen identification and checks, **WELCH** traveled to the banks and negotiated checks using the names and identifications of victims she was impersonating.

8. **JENNIFER NEW** obtained stolen identification and stolen checks from **A.D. HAMPTON, SHERAN LAWERANCE**, and **CHRISTOPHER THOMAS**. Armed with the stolen identification and checks, **NEW** traveled to the banks and negotiated checks using the names and identifications of victims she was impersonating.

9. **JOHN FLORESTAL** was responsible for obtaining stolen identification and checks. Through the perpetration of robberies, auto burglaries, distraction thefts, and purse snatchings, he obtained checks, credit cards, debit cards, and identification from various victims and provided them to **A.D. HAMPTON, SHERAN LAWERANCE** and **CHRISTOPHER THOMAS**.

10. **SINCLAIR BRIAN ELLIS** was responsible for obtaining stolen identification and checks. Through the perpetration of robberies, auto burglaries, distraction thefts, and purse snatchings, he obtained checks, credit cards, debit cards, and identification from various victims and provided them to **A.D. HAMPTON** and **SHERAN LAWERANCE** and **CHRISTOPHER**

THOMAS.

12. **TYESHA CASON** obtained stolen identification and stolen checks from **A.D. HAMPTON, SHERAN LAWERANCE, and CHRISTOPHER THOMAS.** Armed with the stolen identification and checks, **CASON** traveled to the banks and negotiated checks using the names and identifications of victims she was impersonating. **CASON** also obtained stolen identification and stolen checks and distributed them to others to negotiate the stolen checks.

All in violation of Title 18, United States Code, Sections 1349.

COUNTS 2-48
(BANK FRAUD 18 U.S.C. §1344)

13. The allegations contained in paragraphs 2-12 of this Indictment are incorporated by reference as though fully set forth herein.

14. From in or about January 2000, and continuing thereafter until on or about the date of the return of this Indictment, in Broward, Palm Beach, and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

**A.D. HAMPTON,
SHERAN LAWERANCE,
CHRISTOPHER THOMAS,
TYDELL ALLEN,
SISSY WELCH,
JENNIFER NEW,
JOHN FLORESTAL,
SINCLAIR BRIAN ELLIS,
and
TYESHA CASON,**

and others, did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud financial institutions, to wit: Bank of America, Wachovia Bank, Washington Mutual, Union Planters Bank, SunTrust, Interamerica Bank, Bank Atlantic, Fidelity Federal, AmTrust Bank, First Union, the deposits of which were insured by the Federal Deposit Insurance Corporation, and

Broward Schools Credit Union, Tropical Federal Credit Union, and Keys Federal Credit Union, credit unions with accounts insured by the National Credit Union Share Insurance Fund, and to obtain monies, funds, credits, assets, securities, and other property owned by and under the custody and control of these financial institutions, in an amount of approximately \$1,000,000 , by means of false and fraudulent pretenses, representations, and promises.

OBJECT OF THE SCHEME AND ARTIFICE

15. It was the object of the scheme and artifice to defraud for the defendants and others to obtain money through the uttering and cashing of falsely made and fraudulent checks to Bank of America, Wachovia Bank, Washington Mutual, Union Planters Bank, SunTrust, Interamerica Bank, Bank Atlantic, Fidelity Federal, AmTrust Bank, First Union, and Broward Schools Credit Union, Tropical Federal Credit Union, and Keys Federal Credit Union, using stolen, false and fraudulent identification.

MANNER AND MEANS

The manner and means utilized to accomplish the object of the scheme and artifice to defraud included, among other things, the following:

16. Defendants **TYDELL ALLEN, JOHN FLORESTAL, SINCLAIR BRIAN ELLIS,** and others were responsible for obtaining stolen identification and checks. Through the perpetration of robberies, auto burglaries, distraction thefts, and purse snatchings, **ALLEN, FLORESTAL, ELLIS,** and others obtained checks, credit cards, debit cards, and identification from various victims and provided them to Defendants **A.D. HAMPTON, SHERAN LAWERANCE** and **CHRISTOPHER THOMAS.**

17. Defendants **A.D. HAMPTON, SHERAN LAWERANCE** and **CHRISTOPHER THOMAS** obtained stolen checks and stolen identification, completed the blank, stolen checks, and

provided the checks and identifications to other co-conspirators who negotiated the checks at the bank.

18. Defendant **A.D. HAMPTON** recruited a group of individuals known as "The Heavy Boyz" to commit robberies, burglaries and thefts in order for **HAMPTON** to receive the identifications and checks used to commit bank fraud. This group included **TYDELL ALLEN**, **JOHN FLORESTAL** and **SINCLAIR BRIAN ELLIS**, among others. The Heavy Boyz targeted daycare centers, gyms, supermarkets, coffee shops, and other locations that provided them with easy robberies, vehicle burglaries and thefts of wallets and purses.

19. Defendant **THOMAS** worked with Defendants **HAMPTON** and **LAWERANCE** and recruited co-conspirators to whom they provided stolen checks and stolen identification. **LAWERANCE**, **THOMAS**, and **HAMPTON** found check cashers who resembled the victims of the stolen identification and checks and had them impersonate those victims in order to negotiate the checks.

20. Defendants **HAMPTON** and **LAWERANCE** often times provided check cashers with wigs, hats, sunglasses and other items that enabled the cashers to more closely resemble the photographs on the stolen identification.

21. Defendants **HAMPTON** and **LAWERANCE** filled in the blank checks and drove the co-conspirators to the banks so that they could negotiate the checks that **HAMPTON** and **LAWERANCE** had completed.

22. Defendants **SISSY WELCH**, **JENNIFER NEW**, **JOHN FLORESTAL**, **TYDELL ALLEN**, **SINCLAIR BRIAN ELLIS**, and **TYESHA CASON**, and others used the stolen identification documents and stolen checks provided by defendants **HAMPTON**, **LAWERANCE**, and **THOMAS**, to cash and deposit stolen checks at drive-through lanes of financial institutions,

where identification of the suspects by tellers was difficult, and inside the bank.

23. Defendants **SISSY WELCH, JENNIFER NEW, JOHN FLORESTAL, TYDELL ALLEN, SINCLAIR BRIAN ELLIS, and TYESHA CASON**, and others used the stolen identification documents and the stolen checks for bank account takeovers, where the co-conspirators impersonated the legitimate account holders, changed the addresses on the accounts and then made unauthorized withdrawals on the accounts.

24. Defendants **A.D.HAMPTON, SHERAN LAWERANCE, CHRISTOPHER THOMAS, TYDELL ALLEN, SISSY WELCH, JENNIFER NEW, JOHN FLORESTAL, SINCLAIR BRIAN ELLIS, and TYESHA CASON**, used the stolen identification to open instant credit at various retail establishments, and with that instant credit purchased merchandise at those retail establishments.

EXECUTIONS OF THE SCHEME

25. On or about the dates as set forth as to each count below, in execution of the scheme and artifice to defraud, defendants **A.D. HAMPTON, SHERAN LAWERANCE, CHRISTOPHER THOMAS, TYDELL ALLEN, SISSY WELCH, JENNIFER NEW, JOHN FLORESTAL, SINCLAIR BRIAN ELLIS, and TYESHA CASON**, caused funds from customers' bank accounts at Bank of America, Wachovia Bank, Washington Mutual, Union Planters Bank, SunTrust, Interamerica Bank, Bank Atlantic, Fidelity Federal, AmTrust Bank, First Union, and Broward Schools Credit Union, Tropical Federal Credit Union, and Keys Federal Credit Union, to be withdrawn without their authorization, as set forth below:

COUNT	DATE	DEFENDANTS	BANK TRANSACTION
2	1/06/04	HAMPTON, NEW LAWRENCE, THOMAS, ALLEN	Negotiation of check #2057 drawn on J.B.'s Keys Federal Credit Union account and made payable to S.H.in the amount of \$2,480

COUNT	DATE	DEFENDANTS	BANK TRANSACTION
3	1/07/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN	Negotiation of check #4915 drawn on C.M.'s Bank of America account and made payable to S.H. in the amount of \$1,500
4	1/07/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN	Negotiation of check #617 drawn on R.B.'s Bank of America account and made payable to S.H. in the amount of \$1,500
5	1/08/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN	Negotiation of check #616 drawn on R.B.'s Bank of America account and made payable to S.H. in the amount of \$1,400
6	1/08/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN	Negotiation of check #618 drawn on R.B.'s Bank of America account and made payable to S.H. in the amount of \$1,400
7	1/08/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN	Negotiation of check #619 drawn on R.B.'s Bank of America account and made payable to S.H. in the amount of \$650
8	1/08/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN	Negotiation of check #609 drawn on R.B.'s Bank of America account and made payable to S.H. in the amount of \$900
9	1/12/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #3047 drawn on D.M. and R.M.'s First Union National Bank account and made payable to A.B. in the amount of \$1,000
10	1/13/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #2379 drawn on A.F. & N.F.'s Bank of America account and made payable to A.B. in the amount of \$1,000
11	1/13/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #2381 drawn on A.F. & N.F.'s Bank of America account and made payable to A.B. in the amount of \$1,000
12	1/14/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #131 drawn on L.L.'s Bank of America account and made payable to A.B. in the amount of \$1,000
13	1/15/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #2229 drawn on L.L.'s Washington Mutual account and made payable to A.B. in the amount of \$1,000
14	2/23/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #3772 drawn on B.S. & P.P.'s Bank of America account and made payable to T.W. in the amount of \$160

COUNT	DATE	DEFENDANTS	BANK TRANSACTION
15	3/03/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #2535 drawn on R.K. & X.K.'s Wachovia account and made payable to T.W. in the amount of \$1,895.80
16	3/03/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #2536 drawn on R.K. & X.K.'s Wachovia account and made payable to T.W. in the amount of \$1,895.65
17	3/04/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #2538 drawn on R.K. & X.K.'s Wachovia account and made payable to T.W. in the amount of \$1,985.53
18	3/07/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #2537 drawn on R.K. & X.K.'s Wachovia account and made payable to T.W. in the amount of \$1,950.75
19	3/07/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #5958 drawn on J.A. & T.A.'s Bank of America account and made payable to T.W. in the amount of \$1,975.53
20	3/26/04	HAMPTON, NEW LAWERANCE, THOMAS	Negotiation of check #1696 drawn on J.M.'s Washington Mutual account and made payable to S.B. in the amount of \$2,350
21	4/05/04	HAMPTON, LAWERANCE, THOMAS	Negotiation of check #1703 drawn on J.M.'s Washington Mutual account and made payable to S.D. in the amount of \$2,400
22	4/06/04	HAMPTON, LAWERANCE, THOMAS	Negotiation of check #2571 drawn on C.K. & H.K.'s Bank of America account and made payable to S.D. in the amount of \$2,500
23	4/08/04	HAMPTON, LAWERANCE, THOMAS	Negotiation of check #295 drawn on H.T & S.W.T.'s Washington Mutual account and made payable to S.D. in the amount of \$2,400
24	4/08/04	HAMPTON, LAWERANCE, THOMAS	Attempted negotiation of check #1824 drawn on J.A. & R.A.'s Bank of America account and made payable to S.D. in the amount of \$2,300
25	4/28/04	HAMPTON, LAWERANCE, THOMAS	Negotiation of check #1699 drawn on I.A.'s Bank of America account and made payable to C.F. in the amount of \$1,900
26	4/28/04	HAMPTON, LAWERANCE, THOMAS	Negotiation of check #1701 drawn on I.A.'s Bank of America account and made payable to C.F. in the amount of \$2,000

COUNT	DATE	DEFENDANTS	BANK TRANSACTION
27	4/28/04	HAMPTON, LAWERANCE, THOMAS	Negotiation of check #567 drawn on K.I.'s Bank of America account and made payable to C.F. in the amount of \$50
28	4/29/04	HAMPTON, LAWERANCE, THOMAS	Negotiation of check #1702 drawn on J.A.'s Bank of America account and made payable to C.F. in the amount of \$1,800
29	6/27/04	HAMPTON, LAWERANCE, CASON	Negotiation of check #1106 drawn on C.L. & S.L.'s Broward Schools Credit Union Account and made payable to J.S in the amount of \$1,650.75
30	7/03/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN	Negotiation of check # 4596 drawn on G.S's Union Planters account and made payable to G.T.A. in the amount of \$2,400
31	7/04/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN	Negotiation of check #1034 drawn on S.A. & P.F.'s Interamerican Bank account and made payable to G.T.A. in the amount of \$2,200
32	7/04/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN	Negotiation of check #1035 drawn on S.A. & P.F.'s Interamerican Bank account and made payable to G.T.A. in the amount of \$2,300
33	7/05/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN	Negotiation of check #1036 drawn on S.A. & P.F.'s Interamerican Bank account and made payable to G.T.A. in the amount of \$2,400
34	7/10/04	HAMPTON, LAWERANCE, THOMAS, ALLEN ELLIS, WELCH	Negotiation of check #1057 drawn on V.C. & M.C.'s Bank of America account and made payable to G.E. in the amount of \$2,500
35	8/14/04	HAMPTON, LAWERANCE, ELLIS, THOMAS, WELCH	Negotiation of check #1085 drawn on L.L.'s Wachovia account and made payable to I.B. in the amount of \$100
36	8/16/04	HAMPTON, LAWERANCE, THOMAS, WELCH	Negotiation of check #1325 drawn on E.N.'s Wachovia account and made payable to I.B. in the amount of \$30
37	8/25/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN, ELLIS	Attempted negotiation of check #5067 drawn on J.E. & G.E.'s Bank of America account and made payable to L.B. in the amount of \$2,350

COUNT	DATE	DEFENDANTS	BANK TRANSACTION
38	8/27/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN, ELLIS	Negotiation of check #1089 drawn on L.L.'s Wachovia account and made payable to C.S. in the amount of \$999
39	8/27/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN FLORESTAL	Negotiation of check #5797 drawn on C.B.'s Bank of America account and made payable to C.S. in the amount of \$975
40	8/28/04	HAMPTON, NEW LAWERANCE, THOMAS, ALLEN FLORESTAL	Negotiation of check #5798 drawn on C.B.'s Bank of America account and made payable to C.S. in the amount of \$985
41	8/30/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN FLORESTAL	Negotiation of check #5803 drawn on C.B.'s Bank of America account and made payable to C.S. in the amount of \$1,000
42	8/31/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #3576 drawn on M.H.'s SunTrust account and made payable to T.W. in the amount of \$920
43	9/12/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #487 drawn on B.P.'s Wachovia account and made payable to L.T. in the amount of \$2,400
44	9/13/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check #1078 drawn on D.G.'s Union Planters account and made payable to L.T. in the amount of \$2,370
45	9/14/04	HAMPTON, NEW, LAWERANCE, THOMAS, ALLEN	Negotiation of check #1134 drawn on C.S.'s SunTrust account and made payable to L.T. in the amount of \$2,200
46	9/15/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check # 3055 drawn on R.S.'s Bank of America account and made payable to L.T. in the amount of \$2,500
47	9/16/04	HAMPTON, NEW, LAWERANCE, THOMAS	Negotiation of check # 3060 drawn on R.S.'s Bank of America account and made payable to L.T. in the amount of \$2,300
48	10/30/04	HAMPTON, LAWERANCE, CASON	Negotiation of check #1543 drawn on C.B. & M.Q.'s Wachovia Bank Account and made payable to M.S. in the amount of \$1,365.50

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNTS 49-58

(AGGRAVATED IDENTITY THEFT 18 U.S.C. §1028A)

25. The allegations contained in paragraphs 2-12 of this Indictment are incorporated by reference as though fully set forth herein.

26. From on or about July 21, 2004, until on or about the date of the return of this Indictment, in Broward, Palm Beach, and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

**A.D. HAMPTON,
SHERAN LAWERANCE,
CHRISTOPHER THOMAS,
TYDELL ALLEN,
SISSY WELCH,
JENNIFER NEW,
JOHN FLORESTAL,
SINCLAIR BRIAN ELLIS,
and
TYESHA CASON,**

during and in relation to a felony contained in Title 18, United States Code, Chapter 63, that is, bank fraud, in violation of Title 18, United States Code, Section 1344, as charged in Counts 2-26 of this Indictment, did knowingly and willfully transfer, possess and use without lawful authority, a means of identification of another person, as set forth in the individual counts below:

COUNT	DATE	DEFENDANT	IDENTIFICATION	VICTIM'S INITIALS
49	8/14/04	LAWERANCE, WELCH, ELLIS	Driver's license, Date of Birth, Name	I.B.
50	8/27/04	ALLEN, ELLIS	Driver's license, Name, Date of Birth	C.S.
51	8/28/04	ALLEN, FLORESTAL	Driver's license, Name, Date of Birth	C.S.
52	8/30/04	ALLEN, FLORESTAL	Driver's license, Name, Date of Birth	C.S.

COUNT	DATE	DEFENDANT	IDENTIFICATION	VICTIM'S INITIALS
53	9/14/04	HAMPTON, NEW LAWERANCE, THOMAS	Driver's license, Date of Birth, Name, Mastercard	D.G.
54	9/29/04	LAWERANCE, THOMAS, NEW	Driver's license, Date of Birth, Name	L.T.
55	9/30/04	HAMPTON, NEW, LAWERANCE, THOMAS	Driver's license, Name, Date of Birth, Social Security card, Visa card	D.G.
56	10/30/04	HAMPTON, LAWERANCE, CASON	Driver's license, Date of Birth, Name	M.S.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(5) and 2.

COUNT 57

(IDENTITY THEFT 18 U.S.C. §1028)

27. The allegations contained in paragraphs 2-12 of this Indictment are incorporated by reference as though fully set forth herein.

28. From in or about January 2000, and continuing thereafter until on or about the date of the return of this Indictment, in Broward, Palm Beach, and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

**A.D. HAMPTON,
SHERAN LAWERANCE,
and
CHRISTOPHER THOMAS,**

did knowingly transfer and cause to be transferred, identification documents, that is, driver's licenses and Social Security cards, knowing that such documents were stolen, with an effect on interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1028(a)(2), (c)(3)(A), and (b)(3)(B), and 2.

COUNT 58
(ACCESS DEVICE FRAUD 18 U.S.C. §1029)

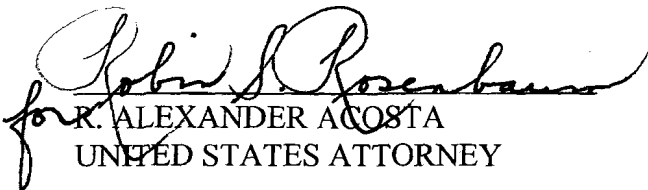
From in or about January 2000, and continuing thereafter until on or about the date of the return of this Indictment, in Broward, Palm Beach, and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

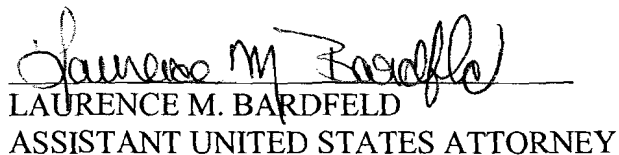
A.D. HAMPTON
SHERAN LAWERANCE,
and
CHRISTOPHER THOMAS,

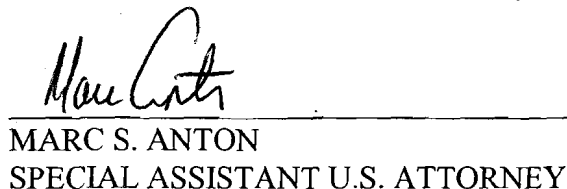
did knowingly and with intent to defraud possess at least fifteen devices which were counterfeit and unauthorized access devices, with an effect on interstate commerce, in violation of Title 18, United States Code, Sections 1029(a)(3), (c)(1)(A)(i), and 2.

A TRUE BILL.

GRAND JURY FOREPERSON


R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY


LAURENCE M. BARDFELD
ASSISTANT UNITED STATES ATTORNEY


MARC S. ANTON
SPECIAL ASSISTANT U.S. ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. _____

vs.

A.D. HAMPTON, et al,

CERTIFICATE OF TRIAL ATTORNEY*

Defendants

Superseding Case Information:

Court Division: (Select One)

X Miami Key West
FTL WPB FTP

New Defendant(s) Yes No
Number of New Defendants
Total number of counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.

2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) NO
List language and/or dialect

4. This case will take 20 days to try

5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)

I	0 to 5 days	<u> </u>	Petty	<u> </u>
II	6 to 10 days	<u> </u>	Minor	<u> </u>
III	11 to 20 days	<u>X</u>	Misdem.	<u> </u>
IV	21 to 60 days	<u> </u>	Felony	<u>X</u>
V	61 days and over	<u> </u>		

6. Has this case been previously filed in this District Court? (Yes or No) NO

If yes:

Judge: _____ Case No. _____

(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) NO

If yes:

Magistrate Case No. _____

Related Miscellaneous numbers: _____

Defendant(s) in federal custody as of _____

Defendant(s) in state custody as of _____

Rule 20 from the _____ District of _____


Is this a potential death penalty case? (Yes or No) NO

7. Does this case originate from a matter pending in the U.S. Attorney's Office prior to April 1, 2003? Yes X No

8. Does this case originate from a matter pending in the U. S. Attorney's Office prior to April 1, 1999? Yes X No
If yes, was it pending in the Central Region? Yes No

9. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? Yes No X

10. Does this case originate from a matter pending in the Narcotics Section (Miami) prior to May 18, 2003? Yes X No


LAURENCE M. BARDFELD
ASSISTANT UNITED STATES ATTORNEY
Florida Bar No. 712450

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: A.D. HAMPTON

Case No: _____

Count #: 1

Conspiracy to Commit Bank Fraud

in violation 18 U.S.C. § 1349

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 2 - 48

Bank Fraud

in violation 18 U.S.C. § 1344

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 53, 55, 56

Aggravated Identity Theft

in violation of 18 U.S.C. §1028A

***Max. Penalty:** Two (2) years' mandatory imprisonment, one (1) year supervised release; \$250,000 fine

Count #: 57

Identity Theft

in violation of 18 U.S.C. §1028

***Max. Penalty:** Five (5) years' imprisonment, three (3) years' supervised release; \$250,000 fine

Count #: 58

Access Device Fraud

In violation of 18 U.S.C. §1029

***Max. Penalty:** Ten (10) years' imprisonment, three (3) years' supervised release; \$250,000 fine

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: SHERAN LAWERANCE

Case No: _____

Count #: 1

Conspiracy to Commit Bank Fraud

in violation 18 U.S.C. § 1349

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 2 - 48

Bank Fraud

in violation 18 U.S.C. § 1344

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 49, 53, 54, 55, 56

Aggravated Identity Theft

in violation of 18 U.S.C. §1028A

***Max. Penalty:** Two (2) years' mandatory imprisonment, one (1) year supervised release; \$250,000 fine

Count #: 57

Identity Theft

in violation of 18 U.S.C. §1028

***Max. Penalty:** Five (5) years' imprisonment, three (3) years' supervised release; \$250,000 fine

Count #: 58

Access Device Fraud

In violation of 18 U.S.C. §1029

***Max. Penalty:** Ten (10) years' imprisonment, three (3) years' supervised release; \$250,000 fine

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: CHRISTOPHER THOMAS

Case No: _____

Count #: 1

Conspiracy to Commit Bank Fraud

in violation 18 U.S.C. § 1349

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 2 - 28, 30-47

Bank Fraud

in violation 18 U.S.C. § 1344

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 53, 54, 55

Aggravated Identity Theft

in violation of 18 U.S.C. §1028A

***Max. Penalty:** Two (2) years' mandatory imprisonment, one (1) year supervised release; \$250,000 fine

Count #: 57

Identity Theft

in violation of 18 U.S.C. §1028

***Max. Penalty:** Five (5) years' imprisonment, three (3) years' supervised release; \$250,000 fine

Count #: 58

Access Device Fraud

In violation of 18 U.S.C. §1029

***Max. Penalty:** Ten (10) years' imprisonment, three (3) years' supervised release; \$250,000 fine

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: TYDELL ALLEN

Case No: _____

Count #: 1

Conspiracy to Commit Bank Fraud

in violation 18 U.S.C. § 1349

***Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 2-8, 30-34, 37-41, 45

Bank Fraud

in violation 18 U.S.C. § 1344

***Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 50, 51, 52

Aggravated Identity Theft

in violation of 18 U.S.C. §1028A

***Max. Penalty:** Two (2) years' mandatory imprisonment, one (1) year supervised release; \$250,000 fine

Count #:

***Max. Penalty:**

Count #:

***Max. Penalty:**

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: SISSY WELCH

Case No: _____

Count #: 1

Conspiracy to Commit Bank Fraud

in violation 18 U.S.C. § 1349

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 34-36

Bank Fraud

in violation 18 U.S.C. § 1344

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 49

Aggravated Identity Theft

in violation of 18 U.S.C. §1028A

***Max. Penalty:** Two (2) years' mandatory imprisonment, one (1) year supervised release; \$250,000 fine

Count #:

***Max. Penalty:**

Count #:

***Max. Penalty:**

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JENNIFER NEW

Case No: _____

Count #: 1

Conspiracy to Commit Bank Fraud

in violation 18 U.S.C. § 1349

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 2, 3, 4-20, 30-33, 37-47

Bank Fraud

in violation 18 U.S.C. § 1344

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 46, 47, 53-55

Aggravated Identity Theft

in violation of 18 U.S.C. § 1028A

***Max. Penalty:** Two (2) years' mandatory imprisonment, one (1) year supervised release; \$250,000 fine

Count #:

***Max. Penalty:** _____

Count #:

***Max. Penalty:** _____

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: JOHN FLORESTAL

Case No: _____

Count #: 1

Conspiracy to Commit Bank Fraud

in violation 18 U.S.C. § 1349

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 39, 40, 41

Bank Fraud

in violation 18 U.S.C. § 1344

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 51, 52

Aggravated Identity Theft

in violation of 18 U.S.C. § 1028A

***Max. Penalty:** Two (2) years' mandatory imprisonment, one (1) year supervised release; \$250,000 fine

Count #:

***Max. Penalty:**

Count #:

***Max. Penalty:**

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: SINCLAIR BRIAN ELLIS

Case No: _____

Count #: 1

Conspiracy to Commit Bank Fraud

in violation 18 U.S.C. § 1349

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 34, 35, 37, 38

Bank Fraud

in violation 18 U.S.C. § 1344

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 49, 50

Aggravated Identity Theft

in violation of 18 U.S.C. §1028A

***Max. Penalty:** Two (2) years' mandatory imprisonment, one (1) year supervised release; \$250,000 fine

Count #:

***Max. Penalty:**

Count #:

***Max. Penalty:**

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: TYESHA CASON

Case No: _____

Count #: 1

Conspiracy to Commit Bank Fraud

in violation 18 U.S.C. § 1349

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 29

Bank Fraud

in violation 18 U.S.C. § 1344

*** Max. Penalty:** Thirty (30) years' imprisonment; five (5) years' supervised release; \$1,000,000 fine

Counts #: 48, 56

Aggravated Identity Theft

in violation of 18 U.S.C. §1028A

***Max. Penalty:** Two (2) years' mandatory imprisonment, one (1) year supervised release; \$250,000 fine

Count #:

***Max. Penalty:**

Count #:

***Max. Penalty:**

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

SEALED INDICTMENT

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

06-60208 CR-MORENO

Case No. _____

18 U.S.C. § 1349
18 U.S.C. § 1344
18 U.S.C. § 1028A(a)(1)
18 U.S.C. § 1028

MAGISTRATE JUDGE
SIMONTON

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

SHAMECA WALTERS,)

NAREAKA DAVIS,)

CORITHIA JOHNSON,)

DEVIAN ROBINSON,)

ANITA PROBY,)

TERESA HOWARD MASON,)

EDITH BAKER,)

DIANA LEATHERS,)

ROLAND EVANS,)

JERRI MARINI,)

and)

JUNE POLKOWSKI,)

Defendants.)

INDICTMENT

The Grand Jury charges that:

COUNT 1

(CONSPIRACY 18 U.S.C. §1349)

1. From in or about January 2002, and continuing thereafter until on or about the date of the return of this Indictment, in Broward, Palm Beach, and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

FILED BY
2006 SEP -7 PM 4:15

D.C.

**SHAMECA WALTERS,
NAREAKA DAVIS,
CORITHIA JOHNSON,
DEVIAN ROBINSON,
ANITA PROBY,
TERESA HOWARD MASON,
EDITH BAKER,
DIANA LEATHERS,
ROLAND EVANS,
JERRI MARINI,
and
JUNE POLKOWSKI,**

did knowingly and intentionally combine, conspire, confederate and agree with each other and with persons known and unknown to the Grand Jury to commit an offense against the United States, that is, to knowingly execute and attempt to execute a scheme and artifice to defraud financial institutions, to wit: Bank of America, Wachovia Bank, First National Bank and Trust, Capital One, Washington Mutual, Grand Bank and Trust, Fidelity Federal, Colonial Bank, Marine Bank and Trust, BankAtlantic, AmTrust, Union Planters Bank, Commercial Bank of Florida, and SunTrust, the deposits of which were insured by the Federal Deposit Insurance Corporation, and Merck, Sharp & Dohme, a credit union with accounts insured by the National Credit Union Share Insurance Fund, and to obtain monies, funds, credits, assets, securities, and other property owned by and under the custody and control of these financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

OBJECT OF CONSPIRACY

2. It was the object of the conspiracy that the Defendants **SHAMECA WALTERS, NAREAKA DAVIS, CORITHIA JOHNSON, DEVIAN ROBINSON, ANITA PROBY, TERESA HOWARD MASON, EDITH BAKER, DIANA LEATHERS, ROLAND EVANS,**

JERRI MARINI, and **JUNE POLKOWSKI**, and others unjustly enriched themselves and others, through the uttering and cashing of stolen checks at Bank of America, Wachovia Bank, First National Bank and Trust, Capital One, Washington Mutual, Grand Bank and Trust, Fidelity Federal, Colonial Bank, Marine Bank and Trust, BankAtlantic, AmTrust, Union Planters Bank, Commercial Bank of Florida, and SunTrust, and Merck, Sharp & Dohme, using stolen, false, and fraudulent identification.

MANNER AND MEANS

3. Defendant **SHAMECA WALTERS** recruited others to participate in bank fraud. She obtained stolen identification and stolen checks and distributed them to others to negotiate the stolen checks. **SHAMECA WALTERS** and other co-conspirators committed thefts of identifications, checks, debit cards, and credit cards from various victims and used those stolen checks and identifications herself, or provided those stolen checks and identifications to other co-conspirators, who then traveled to the various banks and negotiated the checks. **SHAMECA WALTERS** provided co-conspirators with wigs, hats, sunglasses, and other items to disguise their appearances.

4. Defendant **NAREAKA DAVIS** was a close friend of **SHAMECA WALTERS**, and she recruited other co-conspirators to participate in bank fraud. She assisted **WALTERS** in organizing the others and obtained stolen, false and fraudulent identifications and stolen checks, provided them to others, and directed the others to negotiate the checks. **NAREAKA DAVIS** provided co-conspirators with wigs, hats, sunglasses, and other items to disguise their appearances.

5. Defendant **CORITHIA JOHNSON** was a close friend of **SHAMECA WALTERS**, and she recruited other co-conspirators to participate in bank fraud. She assisted **WALTERS** in organizing the others and obtained stolen, false and fraudulent identifications and stolen checks,

provided them to others, and directed the others to negotiate the checks. Defendant **CORITHIA JOHNSON** obtained stolen identification and stolen checks from **TERESA HOWARD MASON**, and traveled to the banks and negotiated checks using the names and identifications of victims she was impersonating.

6. Defendant **DEVIAN ROBINSON** obtained stolen identification and stolen checks from **TERESA HOWARD MASON** and **CORITHIA JOHNSON**. Armed with the stolen identification and stolen checks, **ROBINSON** traveled to the banks and negotiated checks using the names and identifications of victims he was impersonating.

7. Defendant **ANITA PROBY** obtained stolen identification and stolen checks from **SHAMECA WALTERS**. Armed with the stolen identification and checks, **PROBY** traveled to the banks and negotiated checks using the names and identifications of victims she was impersonating.

8. Defendant **TERESA HOWARD MASON** obtained stolen identification and stolen checks from **SHAMECA WALTERS** and **NAREAKA DAVIS**. **TERESA HOWARD MASON** obtained the stolen checks and stolen identification, completed the checks and provided the stolen checks and identifications to co-conspirators who then negotiated the checks at the banks. **TERESA HOWARD MASON** accompanied co-conspirators to the banks to complete their transactions.

9. Defendant **EDITH BAKER** obtained stolen identification and stolen checks from **SHAMECA WALTERS** and **NAREAKA DAVIS**. Armed with the stolen identification and checks, **BAKER** traveled to the banks and negotiated checks using the names and identifications of victims she was impersonating.

10. Defendant **DIANA LEATHERS** obtained stolen identification and stolen checks from **SHAMECA WALTERS**. Armed with the stolen identification and checks, **LEATHERS** traveled

to the banks and negotiated checks using the names and identifications of victims she was impersonating. **LEATHERS** used a false and fraudulent driver's license in the name of an individual with the initials "T.S.," which she obtained from the Florida Department of Motor Vehicles, to cash checks.

11. Defendant **ROLAND EVANS** was responsible for obtaining stolen identification and checks. Through the perpetration of robberies, auto burglaries, distraction thefts, and purse snatchings, he obtained checks, credit cards, debit cards, and identification from various victims and provided them to **SHAMECA WALTERS**.

12. Defendant **JERRI MARINI** obtained stolen identification and stolen checks from **CORITHIA JOHNSON** and **NAREAKA DAVIS**. Armed with the stolen identification and checks, **MARINI** entered the banks and cashed checks using the names and identifications of victims she was impersonating. She wore wigs, sunglasses, hats, and other items supplied by **NAREAKA DAVIS** to hide her true identity.

13. Defendant **JUNE POLKOWSKI** obtained stolen identification and stolen checks from **SHAMECA WALTERS** and **NAREAKA DAVIS**. Armed with the stolen identification and checks, **POLKOWSKI** entered the banks and cashed checks using the names and identifications of victims she was impersonating. She wore wigs, sunglasses, hats and other items provided by **NAREAKA DAVIS** to hide her true identity.

All in violation of Title 18, United States Code, Sections 1349.

COUNTS 2-26
(BANK FRAUD 18 U.S.C. §1344)

14. The allegations contained in paragraphs 1-13 of this Indictment are incorporated by reference as though fully set forth herein.

15. From on or about January 2002, and continuing thereafter until on or about the date of the return of this Indictment, in Broward, Palm Beach, and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

**SHAMECA WALTERS,
NAREAKA DAVIS,
CORITHIA JOHNSON,
DEVIAN ROBINSON,
ANITA PROBY,
TERESA HOWARD MASON,
EDITH BAKER,
DIANA LEATHERS,
ROLAND EVANS,
JERRI MARINI,
and
JUNE POLKOWSKI,**

and others, did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud financial institutions, to wit: Bank of America, Wachovia Bank, First National Bank and Trust, Capital One, Washington Mutual, Grand Bank and Trust, Fidelity Federal, Colonial Bank, Marine Bank and Trust, BankAtlantic, AmTrust, Union Planters Bank, Commercial Bank of Florida, and SunTrust, the deposits of which were insured by the Federal Deposit Insurance Corporation, and Merck, Sharp & Dohme, a credit union with accounts insured by the National Credit Union Share Insurance Fund, and to obtain monies, funds, credits, assets, securities, and other property owned by and under the custody and control of these financial institutions, in an amount of approximately \$1,000,000, by means of false and fraudulent pretenses, representations, and promises.

OBJECT OF THE SCHEME AND ARTIFICE

16. It was the object of the scheme and artifice to defraud for the defendants and others to obtain money through the uttering and cashing of falsely made and fraudulent checks to Bank of America, Wachovia Bank, First National Bank and Trust, Capital One, Washington Mutual, Grand

Bank and Trust, Fidelity Federal, Colonial Bank, Marine Bank and Trust, BankAtlantic, AmTrust, Union Planters Bank, Commercial Bank of Florida, SunTrust, and Merck, Sharp & Dohme, using stolen, false and fraudulent identification.

MANNER AND MEANS

The manner and means utilized to accomplish the object of the scheme and artifice to defraud included, among other things, the following:

17. Defendant **ROLAND EVANS** and others were responsible for obtaining stolen identification and checks. Through the perpetration of robberies, auto burglaries, distraction thefts, and purse snatchings, **EVANS** obtained checks, credit cards, debit cards, and identification from various victims and provided them to Defendant **SHAMECA WALTERS**.

18. Defendant **SHAMECA WALTERS** obtained stolen checks and stolen identification, completed the blank, stolen checks, and provided the checks and identifications to other co-conspirators who negotiated the checks at the bank.

19. Defendant **NAREAKA DAVIS** worked with **WALTERS** and recruited co-conspirators to whom they provided stolen checks and stolen identification. **DAVIS** and **WALTERS** found check cashers who resembled the victims of the stolen identification and checks and had them impersonate those victims in order to negotiate the checks.

20. Defendants **SHAMECA WALTERS** and **NAREAKA DAVIS** often times provided check cashers with wigs, hats, sunglasses and other items that enabled the cashers to more closely resemble the photographs on the stolen identification.

21. Defendants **SHAMECA WALTERS** and **THERESA HOWARD MASON** filled in the blank checks and drove the co-conspirators to the banks so that they could negotiate the checks that **WALTERS** and **HOWARD MASON** had completed.

22. Defendants **CORITHIA JOHNSON, DEVIAN ROBINSON, ANITA PROBY, EDITH BAKER, DIANA LEATHERS, ROLAND EVANS, JERRI MARINI, JUNE POLKOWSKI** and others used the stolen identification documents and stolen checks provided by defendants **SHAMECA WALTERS, NAREAKA DAVIS, and TERESA HOWARD MASON,** to cash and deposit stolen checks at drive-through lanes of financial institutions, where identification of the suspects by tellers was difficult, and inside the bank.

23. Defendants **CORITHIA JOHNSON, DEVIAN ROBINSON, ANITA PROBY, EDITH BAKER, DIANA LEATHERS, ROLAND EVANS, JERRI MARINI, JUNE POLKOWSKI** and others used the stolen identification documents and the stolen checks for bank account takeovers, where the co-conspirators impersonated the legitimate account holders, changed the addresses on the accounts and then made unauthorized withdrawals on the accounts.

EXECUTIONS OF THE SCHEME

24. On or about the dates as set forth as to each count below, in execution of the scheme and artifice to defraud, defendants **SHAMECA WALTERS, NAREAKA DAVIS, CORITHIA JOHNSON, DEVIAN ROBINSON, ANITA PROBY, TERESA HOWARD MASON, EDITH BAKER, DIANA LEATHERS, ROLAND EVANS, JERRI MARINI, and JUNE POLKOWSKI,** caused funds from customers' bank accounts at Bank of America, Wachovia Bank, First National Bank and Trust, Capital One, Washington Mutual, Grand Bank and Trust, Fidelity Federal, Colonial Bank, Marine Bank and Trust, BankAtlantic, AmTrust, Union Planters Bank, Commercial Bank of Florida, SunTrust, and Merck, Sharp & Dohme, to be withdrawn without their authorization, as set forth below:

COUNT	DATE	DEFENDANTS	BANK TRANSACTION
2	8/06/03	LEATHERS	Attempted withdrawal of \$3,000 from T.S.'s Wachovia account.
3	8/8/03	WALTERS/ LEATHERS	Negotiation of check #10190 drawn on DTAS' Wachovia account and made payable to T.S. in the amount of \$983
4	11/05/03	WALTERS/DAVIS/ PROBY	Negotiation of check #517 drawn on S.E.'s Wachovia account and made payable to A.F.L. in the amount of \$987
5	12/08/03	WALTERS	Negotiation of check #1450 drawn on C.R.'s Merck, Sharp & Dohme account and made payable to S.Q. in the amount of \$1,450
6	12/23/03	WALTERS	Deposit of check #1612 on L.A.'s Bank of America account deposited to B.M. in the amount of \$1,140
7	1/02/04	WALTERS	Negotiation of check #298 drawn on O.B & T.B.'s Bank Atlantic account and made payable to M.P. in the amount of \$2,740
8	3/16/04	WALTERS	Negotiation of check #2282 drawn on S.Q.'s Washington Mutual account and made payable to S.E. in the amount of \$2,650.
9	4/15/04	PROBY	Negotiation of check #2154 drawn on K.D.'s Wachovia account and made payable to A.F.L. in the amount of \$986
10	6/15/04	PROBY/EVANS/ HOWARD MASON	Negotiation of check #110 drawn on H.B.'s Capital One account and made payable to A.F.L. in the amount of \$725
11	7/01/04	WALTERS/DAVIS/ BAKER	Attempted negotiation of check #6518 drawn on G.B.'s Wachovia account and made payable to L.C.L. in the amount of \$2,875
12	7/06/04	POLKOWSKI	Withdrawal of \$1,650 from G.B.'s Wachovia account
13	7/09/04	WALTERS/ POLKOWSKI	Negotiation of check #952 drawn on N.M.'s Washington Mutual account and made payable to L.L. in the amount of \$985
14	7/09/04	WALTERS/DAVIS/ BAKER	Negotiation of check #955 drawn on N.M.'s Washington Mutual account and made payable to G.L. in the amount of \$960

COUNT	DATE	DEFENDANTS	BANK TRANSACTION
15	7/09/04	WALTERS/ POLKOWSKI	Attempted negotiation of check #954 drawn on N.M.'s Washington Mutual account and made payable to L.L. in the amount of \$1,950
16	8/13/04	WALTERS/DAVIS/ BAKER	Negotiation of check #1018 drawn on J.A.'s Wachovia account and made payable to R.M.D. in the amount of \$4,875
17	8/19/04	EVANS	Withdrawal of \$2,000 from S.B.'s Washington Mutual account
18	4/20/05	JOHNSON	Negotiation of check #511 drawn on B.D.'s Commercial Bank of Florida account and made payable to M.C. in the amount of \$945
19	4/20/05	JOHNSON	Negotiation of check #513 drawn on B.D.'s Commercial Bank of Florida account and made payable to M.C. in the amount of \$782
20	5/25/05	JOHNSON	Negotiation of check #537 drawn on B.D.'s Commercial Bank of Florida account and made payable to S.L. in the amount of \$1,300
21	5/26/05	ROBINSON	Negotiation of check #477 drawn on B.D.'s Commercial Bank of Florida account and made payable to S.L. in the amount of \$1,375
22	6/14/05	ROBINSON	Negotiation of check #242 drawn on D.L.'s Bank Atlantic account and made payable to I.B. in the amount of \$1,950
23	6/20/05	ROBINSON/ JOHNSON	Negotiation of check #489 drawn on B.D.'s Commercial Bank of Florida account and made payable to I.B. in the amount of \$1,830
24	6/21/05	MARINI	Withdrawal of \$15,000 from the Bank of America account of T.T.
25	6/22/05	MARINI	Withdrawal of \$15,000 from the Bank of America account of T.T.
26	6/29/05	MARINI	Withdrawal of \$18,500 from the Bank of America account of T.T.

All in violation of Title 18, United States Code, Sections 1344 and 2.

COUNTS 27-43
(AGGRAVATED IDENTITY THEFT 18 U.S.C. §1028A)

25. The allegations contained in paragraphs 1-13 of this Indictment are incorporated by reference as though fully set forth herein.

26. From on or about July 21, 2004, until on or about the date of the return of this Indictment, in Broward, Palm Beach, and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

**SHAMECA WALTERS,
NAREAKA DAVIS,
CORITHIA JOHNSON,
DEVIAN ROBINSON,
ANITA PROBY,
TERESA HOWARD MASON,
EDITH BAKER,
DIANA LEATHERS,
ROLAND EVANS,
JERRI MARINI,
and
JUNE POLKOWSKI,**

during and in relation to a felony contained in Title 18, United States Code, Chapter 63, that is, bank fraud, in violation of Title 18, United States Code, Section 1344, as charged in Counts 2-26 of this Indictment, did knowingly and willfully transfer, possess and use without lawful authority, a means of identification of another person, to wit, the name, driver's license number, and date of birth, any one of which would constitute a violation, as set forth in the individual counts below:

COUNT	DATE	DEFENDANT	IDENTIFICATION	VICTIM'S INITIALS
27	7/22/04	WALTERS/BAKER	Driver's license, Date of Birth, Name	L.P.
28	8/13/04	WALTERS/BAKER/DAVIS	Driver's license, Date of Birth, Name	R.M.D.
29	8/14/04	WALTERS/BAKER/DAVIS	Driver's license, Date of Birth, Name	R.D.

COUNT	DATE	DEFENDANT	IDENTIFICATION	VICTIM'S INITIALS
30	8/19/04	EVANS	Driver's license, Date of Birth, Name	S.B.
31	9/16/04	PROBY/HOWARD MASON	Driver's license, Date of Birth, Name	J.K
32	4/19/05	JOHNSON	Driver's license, Date of Birth, Name	M.C.
33	5/25/05	JOHNSON	Driver's license, Date of Birth, Name	S.L.
34	5/26/05	ROBINSON	Driver's license, Date of Birth, Name	S.L.
35	6/15/05	ROBINSON	Driver's license, Date of Birth, Name	I.B.
36	6/18/05	ROBINSON/JOHNSON	Driver's license, Date of Birth, Name	I.B
37	6/21/05	MARINI	Driver's license, Date of Birth, Name	T.T.
38	6/22/05	MARINI	Driver's license, Date of Birth, Name	T.T.
39	6/29/05	MARINI	Driver's license, Date of Birth, Name	T.T.
40	10/25/04	POLKOWSKI	Driver's license, Date of Birth, Name	C.M.
41	4/10/06	ROBINSON/JOHNSON/ HOWARD MASON	Social Security card, Name, Social Security number	B.K.
42	4/10/06	ROBINSON/JOHNSON/ HOWARD MASON	Driver's license, Date of Birth, Name	C.C.
43	4/10/06	ROBINSON/JOHNSON/ HOWARD MASON	Driver's license, Date of Birth, Name	J.D.

All in violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)(5) and 2.

COUNT 44
(IDENTITY THEFT 18 U.S.C. §1028)

27. The allegations contained in paragraphs 1-13 of this Indictment are incorporated by reference as though fully set forth herein.

28. From in or about January 2002, and continuing thereafter until on or about the date of the return of this Indictment, in Broward, Palm Beach, and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendants,

**SHAMECA WALTERS,
NAREAKA DAVIS,
CORITHIA JOHNSON,
ROLAND EVANS,
and
TERESA HOWARD MASON,**

did knowingly transfer and cause to be transferred, identification documents, that is, driver's licenses and Social Security cards, knowing that such documents were stolen, with an effect on interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1028(a)(2), (c)(3)(A), and (b)(3)(B), and 2.

FORFEITURE

1. The allegations of Counts 1- 44 of this Indictment are realleged and incorporated by reference for the purpose of alleging forfeitures to the United States of America, pursuant to the provisions of Title 18, United States Code, 982(a)(2)(B) and 981(a)(1)(c), and the procedures outlined in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461.

2. Upon conviction of any violation of Title 18, United States Code, Section 1028, defendant **NAREAKA DAVIS** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violation, and any property used, or intended to be used,

in any manner or part, to commit or facilitate the commission of such violations, including but not limited to the property described below.

3. The property subject to forfeiture includes, but is not limited to, the following:

**A white 2002 4-door Jaguar, Vehicle Identification Number
SAJEA51C82WC28941, Florida Tag E142HX.**

4. If any of the property or proceeds described above as being subject to forfeiture pursuant to any violation of Title 18, United States Code, Sections 1028, as a result of any act or omission of the defendant:

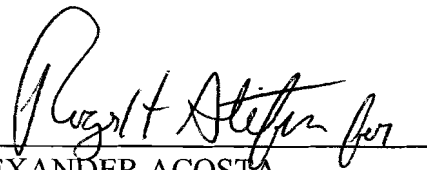
- A: cannot be located upon the exercise of due diligence;
- B: has been transferred, or sold to, or deposited with a third person;
- C: has been placed beyond the jurisdiction of the Court;
- D: has been substantially diminished in value; or
- E: has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c) to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property or to seek the return of the property to the jurisdiction of the Court so that the property may be seized and forfeited.


All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 981(a)(1)(C), and Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461.

A TRUE BILL.

GRAND JURY FOREPERSON



R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY



LAURENCE M. BARDFELD
ASSISTANT UNITED STATES ATTORNEY